

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

CRAIG GOULET,	)	CASE NO. 04 12577
	)	
Plaintiff,	)	JUDGE TORRO
	)	
vs.	)	
	)	
NEW PENN MOTOR EXPRESS, INC.,	)	<b><u>DEFENDANT, NEW PENN MOTOR</u></b>
et al.	)	<b><u>EXPRESS, INC.'S MOTION FOR</u></b>
	)	<b><u>EXTENSION OF TIME TO</u></b>
Defendants.	)	<b><u>RESPOND TO PLAINTIFF'S FIRST</u></b>
		<b><u>SET OF INTERROGATORIES</u></b>

Defendant, New Penn Motor Express, Inc., ("New Penn"), respectfully requests leave until July 7, 2005 within which to respond to Plaintiff's First Set of Interrogatories.

New Penn previously sought and received from Plaintiff an additional two weeks to respond to the interrogatories. New Penn is seeking an additional nine days because the individuals at New Penn who possess the knowledge to respond to the interrogatories have been on vacation and traveling on company business. Consequently, counsel for New Penn has not had a full opportunity to properly respond to the interrogatories. It is not anticipated that New Penn will seek any further time to respond to Plaintiff's interrogatories.

Pursuant to local rule, counsel for New Penn has communicated with Plaintiff's counsel in an attempt to resolve this matter and no resolution has been possible. The filing of this motion should not prejudice any of the parties and it will not adversely impact the Court's scheduling order.

For the foregoing reasons, Defendant, New Penn Motor Express, Inc., respectfully requests leave until July 7, 2005 within which to respond to Plaintiff's First Set of Interrogatories.

Respectfully submitted,

/s/ Carl H. Gluek

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**CERTIFICATE OF SERVICE**

A copy of Defendant, New Penn Motor Express, Inc.'s Motion for Extension of Time to Respond to Plaintiff's First Set of Interrogatories was served upon to Scott A. Lathrop, Esq., *Attorney for Plaintiff*, Scott A. Lathrop & Associates, 122 Old Ayer Road, Groton, MA 01450 and Matthew E. Dwyer, Esq., *Attorney for Teamsters Local 25*, Dwyer, Duddy, Facklam, One Center Plaza, Suite 360, Boston, MA 02108 via the Court's electronic filing system on this 27<sup>th</sup> day of June 2005.

/s/ Carl H. Gluek

One of the Attorneys for Defendants